

## REMARKS

The Office Action mailed July 27, 2005, has been reviewed and carefully considered.

Claims 1-13 are pending in the application with claims 13 being withdrawn from consideration.

On page 2 of the Office Action, claims 1-12 were rejected under 35 U.S.C. § 102(e) as being anticipated by Lille.

Applicant respectfully traverses the rejections. Applicant respectfully submits that Mao fails to disclose, teach or suggest Applicant's invention as recited in the claims.

In claim 1, a liftoff mask having a desired width is formed. Leads are formed contiguous to and on opposite sides of the liftoff mask. The liftoff mask is removed leaving fencing on the leads. A layer of carbon is formed over the leads after removal of the mask. Then, chemical mechanical polishing is performed on the leads at the fencing to preferentially remove a portion of the leads including the fencing and a portion of the carbon layer. Similar language is cited in independent claim 6.

In contrast, Lille merely teaches forming a mask over a sensor. Leads are deposited over the mask and a hard bake layer. The mask is removed via a lift-off process. Fig. 18 is presented showing the sensor after the mask is removed. However, Fig. 18 does not show any fencing. Rather, according to Lille, a carbon layer is deposited over the mask and the leads prior to removal of the mask. The mask is removed using chemical-mechanical polishing. While a rectangular photoresist-only mask is shown, the invention is primarily described using a mask having a cutout. Lille does not even recognize the problem of fencing after removal of the mask. Moreover, the steps are not performed as recited in Applicants' independent claims and therefore fencing would not be removed as recited in the independent claims. Still further, Lille fails to

suggest performing CMP on the leads at the fencing to preferentially remove a portion of the leads including the fencing and a portion of the carbon layer.

Accordingly, Applicants respectfully submit that Lille fails to teach, disclose or suggest the invention as recited in claims 1 and 6.

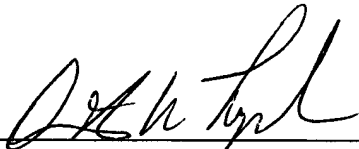
Dependent claims 2-5 and 7-12 are also patentable over the references, because they incorporate all of the limitations of the corresponding independent claims 1 and 6. Further dependent claims 2-5 and 7-12 recite additional novel elements and limitations. Applicants reserve the right to argue independently the patentability of these additional novel aspects. Therefore, Applicants respectfully submit that dependent claims 2-5 and 7-12 are patentable over the cited references, and request that the objections to the independent claims be withdrawn.

On the basis of the above amendments and remarks, it is respectfully submitted that the claims are in immediate condition for allowance. Accordingly, reconsideration of this application and its allowance are requested.

If a telephone conference would be helpful in resolving any issues concerning this communication, please contact Attorney for Applicant, David W. Lynch, at 423-757-0264.

Respectfully submitted,

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